



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 9, 2016

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Almonte, et al.*, 16 Cr. 670 (AJN)

Dear Judge Nathan:

The Government writes to provide the Court with an update with respect to discovery in this matter, which is substantially completed.

First, the Government has produced redacted versions of two of the three Facebook returns that it previously was unable to produce due to their size and concerns over images that appeared to constitute child pornography. The third return, which is the largest and therefore the most difficult to redact, is still being processed. The Government hopes to be in a position to produce a redacted version of that return next week.

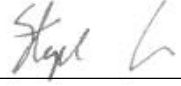
Second, the Government has produced the statements of the defendants contained in records from the Administration for Children's Services to the relevant defendants.

Third, the Government has produced the contents of approximately half of the electronic devices seized incident to the defendants' arrests. This Office received data from five additional devices earlier today and anticipates producing that data via hard drive next week. It appears that three of the devices were fully extracted, while two were partially extracted and may have additional recoverable data. Finally, there are two devices that presented technical difficulties and therefore are still being processed. Any additional data that can be recovered from the two

partially-extracted devices and the data from the two un-extracted devices will be produced as soon as it becomes available, consistent with the Government's obligations under Rule 16.

Respectfully submitted,

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cc: All counsel (by ECF)